

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

PORCHA WOODRUFF,
an individual,
Plaintiff,

Case No. 5:23-cv-11886
Hon. Judith E. Levy

V

CITY OF DETROIT
a municipal corporation,

LaSHAUNTIA OLIVER,
City of Detroit Police Detective,
Individually, and in her Official
Capacities, and

Defendants.

**REPLY TO DEFENDANT LaSHAUNTIA OLIVER'S SPECIAL AND
AFFIRMATIVE DEFENSES**

Plaintiff, PORCHA WOODRUFF, alleges the following:

1. Plaintiff denies the allegations contained in Defendant's Special and Affirmative Defenses Paragraph 1, as untrue.
 - a. Plaintiff denies the allegations contained in Defendant's Special and Affirmative Defenses Paragraph 1a, as untrue.

- b. Plaintiff neither admits nor denies the allegations contained in Defendant's Special and Affirmative Defenses Paragraph 1b.
 - c. Plaintiff denies the allegations contained in Defendant's Special and Affirmative Defenses Paragraph 1c, as untrue.
 - d. Plaintiff denies the allegations contained in Defendant's Special and Affirmative Defenses Paragraph 1d, as untrue.
- 2. Plaintiff denies the allegations contained in Defendant's Special and Affirmative Defenses Paragraph 2, as untrue.
 - 3. Plaintiff denies the allegations contained in Defendant's Special and Affirmative Defenses Paragraph 3, as untrue by way of further answer the Defendant lists as "his" but Plaintiff is a female.
 - 4. Plaintiff denies the allegations contained in Defendant's Special and Affirmative Defenses Paragraph 4, as untrue.
 - 5. Plaintiff denies the allegations contained in Defendant's Special and Affirmative Defenses Paragraph 5, as untrue.
 - 6. Plaintiff denies the allegations contained in Defendant's Special and Affirmative Defenses Paragraph 6, as untrue.
 - 7. Plaintiff denies the allegations contained in Defendant's Special and Affirmative Defenses Paragraph 7, as untrue.

8. Plaintiff denies the allegations contained in Defendant's Special and Affirmative Defenses Paragraph 8, as untrue.
9. Plaintiff denies the allegations contained in Defendant's Special and Affirmative Defenses Paragraph 9, as untrue.
10. Plaintiff denies the allegations contained in Defendant's Special and Affirmative Defenses Paragraph 10, as untrue by way of further answer the Defendant lists as "himself" but Plaintiff is a female.
11. Plaintiff denies the allegations contained in Defendant's Special and Affirmative Defenses Paragraph 11, as untrue.
12. Plaintiff denies the allegations contained in Defendant's Special and Affirmative Defenses Paragraph 12, as untrue.
13. Plaintiff denies the allegations contained in Defendant's Special and Affirmative Defenses Paragraph 13, as untrue.
14. Plaintiff denies the allegations contained in Defendant's Special and Affirmative Defenses Paragraph 14, as untrue.
15. Plaintiff denies the allegations contained in Defendant's Special and Affirmative Defenses Paragraph 15, as untrue.
16. Plaintiff denies the allegations contained in Defendant's Special and Affirmative Defenses Paragraph 16, as untrue.

17. Plaintiff denies the allegations contained in Defendant's Special and Affirmative Defenses Paragraph 17, as untrue.

18. Plaintiff denies the allegations contained in Defendant's Special and Affirmative Defenses Paragraph 18, as untrue.

Wherefore, Plaintiff respectfully request this Honorable Court grant the relief requested in its complaint.

Dated: September 1, 2023

/s/Ivan L. Land
Ivan L. Land (P65879)
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Certificate of Service

I hereby certify that I electronically filed the foregoing papers with the Court Clerk via ECF on September 1, 2023, to serve all parties.

/s/Ivan L. Land
Ivan L. Land